

KATRINA WILLIAMS MCCOY
3721 East Northern Parkway
Baltimore, MD 21206

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

KATRINA WILLIAMS MCCOY)

Plaintiff,)

v.)

STARZ ENCORE GROUP)
a/k/a ENCORE MEDIA COMPANY)

Defendant.)

Civil Action No. 02 CV 5125

**PLAINTIFF'S RESPONSES TO
DEFENDANT'S CONSOLIDATED
INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF
DOCUMENTS**

Plaintiff, Katrina Williams McCoy responds to Defendant's Consolidated Interrogatories
and Requests for Production of Documents as follows:

INTERROGATORIES

1. Please state your full name, including your middle name or names, your Social
Security number and date and place of birth.

RESPONSE: My full name is Katrina Williams McCoy, My social security
number is 058-54-1954, and my date of birth is June 6, 1958. I was born in Yonkers, NY.

2. Please state the address of each residence you have had in the last ten years,
including your current residence, and state the number of years you resided there and whether
you rented or owned the premises.

RESPONSE: For the past ten years I have had two residences. My current
address is 3721 East Northern Parkway Baltimore, MD 21206. I have resided at this address
for 8 years; I own this house. My previous address was 1804 Ramblewood Rd.
Baltimore, MD 21239, I resided in this apartment for 15 years; I rented this apartment

Baltimore, MD 21206
(410) 444-2577

7. State the names, addresses and telephone numbers of every person, known to you or to your attorneys, who has or claims to have any knowledge regarding the facts and circumstances surrounding the occurrence of the incidents referred to in your Complaint or in your answers to these Interrogatories, including, but not limited to, eye witnesses to such incidents and other persons having any knowledge thereof.

RESPONSE: Individuals names, addresses and telephone numbers of who are likely to have any knowledge regarding the facts and circumstances surrounding the occurrence of the incidents referred to in the Complaint or in incidents and other person having any knowledge thereof.

1. Dee Filey Davis
13812 Glenside Rd.
Cleveland, OH 44110
(216) 761-0760

Ms. Davis, former District Manager for Starz Encore Group based in the Chicago Office, who was terminated under the same exact circumstances as the Defendant has knowledge relevant to the racial climate at Starz Encore Group. (Ms. Davis is a black female)

2. Lee Gashmaxey
811 South Sanfernando Blvd.
Burbank, CA 91502
(818) 736-7028

Ms. Gashmaxey, former Manager, of Production at Starz Encore Group's former Multi-Cultural Division based in Englewood Colorado, has knowledge relevant to the racial climate at Starz Encore Group

3. Todd M. Goldman
633 Ashmead Road
Cheltenham, PA 19012
(267) 243-2021

Mr. Goldman, candidate interviewed by Starz Encore Group for a Trainer position has information relevant to the Plaintiff's complaint.

Mar 18 2003 5:21PM

ARON GILBERT TIMM ESQ

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VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 3-18-03

Katrina McCoy
Katrina McCoy